

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

OMAR E. ROMERO-ACOSTA,

Plaintiff

v.

**BOTTLES, KINDRED
SPIRITS INC., AND
RICHARD GONSALVES**

Defendants

Civil Case No.: 3:23-CV-01163

**INFORMATIVE MOTION RE PLANNED ABSENCES FROM
JURISDICTION**

NOW COMES THE UNDERSIGNED ATTORNEY, and respectfully informs the Court of certain planned absences from Puerto Rico over the next several months and further requests the Court to take these trips into account with respect to procedural events in this case.

In support of these requests, the undersigned attorney respectfully states as follows:

1. On April 13, 2023, the undersigned submitted her appearance in this case on behalf of the plaintiff, thereby moving to substitute current counsel for the plaintiff.
2. She also moved for leave to amend the complaint, to include five other members of the wait staff at the restaurant known as “Bottles” and requested this Court to allow this matter to be pursued as a Fair Labor Standards Act Collective Class Action.
3. Long before assuming the representation of the plaintiff, the undersigned had planned three short absences from the jurisdiction in the coming months.
4. The dates for the trips are not flexible, as the tickets have already been

purchased, and moreover, the purpose of the trips is to celebrate significant family events, including graduations and milestone birthdays, for which the dates are not subject to alteration.

5. Two of the three trips are to international locations, where email, internet and phone service may be spotty.

6. The undersigned represents to the Court that she does not believe that these planned absences will interfere with the progress of this case. The longest of the absences is only a little over a week, and the undersigned believes that she will have no difficulty coordinating litigation events with defense counsel.

The trips outside of Puerto Rico are as follows:

- From May 1st to May 4th;
- From May 28th to June 6th;
- From August 9th to August 15th

WHEREFORE, the undersigned attorney for the plaintiff respectfully requests that this Court take these dates into account with respect to any procedural requirements in this case.

This is to certify that this Notice is being submitted through the ECF filing system, which will automatically notify all counsel of record.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico this 15th day of April, 2024.

Berkan/Mendez

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